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*Attorneys for Plaintiff  
IdeaVillage Products Corp.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IDEAVILLAGE PRODUCTS CORP.,  
a New Jersey corporation,

Plaintiff,

vs.

BRETT SAEVITZON; ALL THE J'S  
LLC; SPOT ON DIRECT  
RESPONSE, LLC; D R PRODUCT  
GROUP, LLC; PAUL VON MOHR;  
INTERACTIVE GROUP LLC;  
PREXIO TOYS LTD. and  
INFOMERCIALS, INC.;

Defendants.

Civil Action No.: 11-7548 (WJM) (MF)

**NOTICE OF MOTION TO REMAND**

*(Motion Returnable: February 6,  
2012 or on an earlier date as may  
be determined by the Court)*

*(Document Electronically Filed)*

TO: Andrew R. Bronsnick, Esq.  
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Newark, New Jersey 07102

Attorneys for Defendants,  
Brett Saevitzon and Spot On  
Direct Response, LLC

**PLEASE TAKE NOTICE** that on February 6, 2012, at a time to be determined by the Court, the undersigned counsel for Plaintiff IdeaVillage Products Corp. ("IDV") will move before the Honorable William J. Martini, U.S.D.J., remanding this action to the Superior Court of New Jersey, Chancery Division, Passaic County, from where it was removed by Defendant Paul von Mohr.

**PLEASE TAKE FURTHER NOTICE** that in support thereof, the undersigned shall rely upon Brief in Support of Plaintiff's Motion to Remand, the Declaration of Donald A. Beshada and the Exhibits attached thereto, and all other pleadings and papers of record in this matter.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff requests that this matter be heard on an expedited basis.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 1447(c), Plaintiff reserves the right to seek attorneys' fees and costs if opposition to the motion is filed by Defendants.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**HARTMANN DOHERTY**  
**ROSA BERMAN & BULBULIA, LLC**

/s/Michael G. Langan  
MICHAEL G. LANGAN

**BESHADA FARNESE LLP**

/s/Donald A. Beshada  
DONALD A. BESHADA

Dated: January 3, 2011

Attorneys for Plaintiff  
IdeaVillage Products Corp.

**CERTIFICATION OF SERVICE**

I hereby certify that on this date a true copy of the within Notice of Motion and all supporting papers were served on counsel for Defendants via CM/ECF.

/s/Michael G. Langan  
MICHAEL G. LANGAN

Dated: January 3, 2011